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January 7, 2020

VIA ECF

The Honorable J. Paul Oetken
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007


United States v. Kukushkin, et al. 19 CR. 725 (JPO)

Dear Judge Oetken:

We are counsel to Andrey Kukushkin in the above referenced matter. We write to respectfully request an opportunity for the defense to reply to the government's recently filed opposition (Dkt. No. 61) to our December 12, 2019 application pursuant to §3504 (Dkt No. 45) and propose a deadline for that reply of January 9, 2020.

We thank the Court for its consideration.

Respectfully submitted,


Gerald B. Lefcourt

cc: All counsel (via ecf)